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September 23, 2016

Hon. I. Leo Glasser
United States District Court Judge
Courtroom 8B South, Chambers Room 921 South
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Buttaro v. City of New York,
15-cv-5703 (ILG)

Dear Judge Glasser:

I am one of the plaintiff's counsel in this action and I write to the Court for permission for plaintiff's counsel, John Lenoir and myself, to withdraw from this action pursuant to Local Civil Rule 1.4.

The reason for the request is that there has been a complete breakdown in our ability to communicate with the plaintiff. Further details about the nature of the breakdown in the attorney-client can be provided to the Court, and in the event that the Court requires further information, I request leave to file an affirmation for in camera review by the Court only in order to preserve confidential and privileged information.

In addition, I also request that the Court enter a temporary stay of this action so that the plaintiff can obtain new counsel or appear as his own counsel. A temporary stay is requested because on September 15, 2016 the Court issued its Decision on the defendants' motion to dismiss the complaint and the plaintiff is required to file any amended complaint by September 30, 2016, which is only

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seven days from now. To protect the plaintiff's rights under the circumstances a
an immediate stay is appropriate.

The position of the action on the calendar does not require a denial of this
motion. This action was commenced on October 1, 2015, about one year ago, and
the Court issued its Decision on the defendants' pre-answer motion to dismiss on
September 15, 2016. No discovery has yet taken place and the parties have not yet
held the initial Rule 16 scheduling conference. As such, granting this motion will
not unduly hinder the action and will not prejudice of the Defendants.

For these reasons, we request the motion by Nathaniel B. Smith and John
Lenoir to withdraw as plaintiff's counsel be granted and that the Court enter a
temporary stay for 60 days so that plaintiff can obtain new counsel or appear as his
own counsel in this action.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Nathaniel B. Smith", written in a cursive style.

Nathaniel B. Smith

cc:
All Counsel by EFC
Plaintiff (by Email)